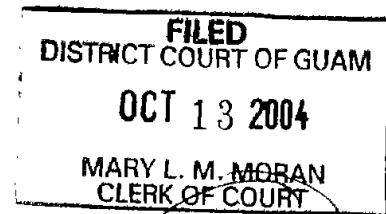


JOAQUIN C. ARRIOLA
ANITA P. ARRIOLA
JACQUELINE T. TERLAJE
ARRIOLA, COWAN & ARRIOLA
259 Martyr Street, Suite 201
Hagåtña, Guam 96910
Telephone: (671) 477-9730/33
Facsimile: (671) 477-9734

Counsel for Plaintiffs Alan Sadhwani, et al.



IN THE UNITED STATES
DISTRICT COURT OF GUAM

ARRIOLA, COWAN & ARRIOLA, HAGATNA, GUAM 96910

ALAN SADHWANI, LAJU
SADHWANI, and K. SADHWANI'S
INC., a Guam corporation,
Plaintiffs,

vs.

HONGKONG AND SHANGHAI
BANKING CORPORATION, LTD., a
Foreign corporation, JOHN DOE I
through JOHN DOE X,
Defendants.

CIVIL CASE NO. 03-00036

NOTICE OF MOTION AND
PLAINTIFFS' MOTION FOR
SANCTIONS

**TO: DEFENDANT HONGKONG AND SHANGHAI BANKING CORPORATION,
LTD. AND ITS ATTORNEYS OF RECORD BRONZE & TANG AND LAW
OFFICES OF RICHARD A. PIPES:**

PLEASE TAKE NOTICE that plaintiffs will bring on for hearing their Motion for Sanctions on or after November 3, 2004, at _____m. or as soon thereafter as the matter may be heard before the Honorable District Court Judge in the U.S. District Court of Guam, 4th Floor, U. S. Courthouse, 520 West Soledad Avenue, Hagåtña, Guam 96910.

Plaintiffs' motion is based on F.R.C.P. 11, 28 U.S.C. section 1927, the inherent authority of the Court, the memorandum of points and authorities in support of the motion, the declaration of

ORIGINAL

Anita P. Arriola and exhibits attached thereto, all of the pleadings and records filed in this action, and any oral or documentary evidence that may be adduced at the hearing thereon.

Dated this 13th day of October, 2004.

ARRIOLA, COWAN & ARRIOLA
Attorneys for Plaintiffs Alan Sadhwani, et al.

By: Anita P. Arriola
ANITA P. ARRIOLA

ARRIOLA, COWAN & ARRIOLA, HAGATNA, GUAM 96910

CERTIFICATE OF SERVICE

I, ANITA P. ARRIOLA, hereby certify that on October 13, 2004, I caused to be served via hand delivery, a **NOTICE OF MOTION AND PLAINTIFFS' MOTION FOR SANCTIONS** to:

**Jacques G. Bronze, Esq.
Bronze & Tang, P.C.
2nd Floor, BankPacific Building
825 S. Marine Drive
Tamuning, Guam 96913**

Dated this 13th day of October, 2004.


ANITA P. ARRIOLA

ARRIOLA, COWAN & ARRIOLA, HAGATNA, GUAM 96910